



Debevoise & Plimpton LLP
66 Hudson Boulevard
New York, NY 10001
+1 212 909 6000

December 1, 2023

BY ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Proskauer Rose LLP v. Jonathan O'Brien*, No. 1:22-CV-10918-AT

Dear Judge Torres:

We represent Plaintiff Proskauer Rose LLP (“Proskauer”) in the above-referenced action, and we write on behalf of Proskauer and Defendant Jonathan O’Brien (together, the “Parties”). Pursuant to the Court’s October 25, 2023 Order Regarding Temporary Stay, ECF No. 108, the Parties have engaged in settlement discussions but have not yet been able to reach an agreement. Although the Parties aim to continue negotiations, we will also move the litigation forward while we continue our discussions. In light of the time elapsed during the stay, the Parties respectfully request that the Court enter an order amending the scheduled deadlines in this case, as follows:

The Honorable Analisa Torres

2

December 1, 2023

Event	Current Deadline¹	Proposed Deadline
Defendant to file Answer or Otherwise Respond to Amended Complaint (Dkt. 108)	November 29, 2023	February 29, 2024
Plaintiff to respond to Defendant's interrogatory requiring identification of trade secrets Defendant allegedly misappropriated (Dkt. 108)	November 29, 2023	February 29, 2024
Requests for admission (Dkt. 97)	October 25, 2023	March 25, 2024
Deadline for parties to meet and confer on a schedule for expert disclosures (Dkt. 97)	November 15, 2023	April 15, 2024
Fact discovery closes; all depositions completed (Dkt. 97)	December 15, 2023	May 15, 2024
Deadline for completion of expert discovery (Dkt. 97)	January 22, 2024	June 21, 2024
Deadline for a pre-motion conference for summary judgment motion (Dkt. 97)	December 29, 2023	May 29, 2024
Deadline for counsel to meet face-to-face for at least one hour to discuss settlement (Dkt. 97)	December 29, 2023	May 29, 2024
Case management conference (Dkt. 97)	January 16, 2024	March 16, 2024
Deadline for Final Pretrial Submissions (Dkt. 97)	February 21, 2024	July 22, 2024

¹ The "Current Deadlines" calculated above are from the dates set forth either in the Court's October 25, 2023 Order Regarding Temporary Stay, ECF No. 108 or its July 3, 2023 Order, ECF No. 97.

The Honorable Analisa Torres

3

December 1, 2023

Although the Parties recognize this proposed schedule exceeds the 120-day period set forth in the initial scheduling order entered by the Court, we respectfully submit it is warranted in light of the Parties' twin goals of moving the case forward while continuing to explore a consensual resolution.

We appreciate the Court's attention to this matter.

/s/ Jyotin Hamid
Jyotin Hamid
DEBEVOISE & PLIMPTON LLP
66 Hudson Boulevard
New York, New York 10001
(212) 909-6000
jhamid@debevoise.com